

Exhibit G

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
KATRINA PEEPLES,

Plaintiffs,

-against-

CITY OF NEW YORK, NYPD OFFICER FRIENDLY, NYPD
POLICE OFFICER ANTHONY RICCIARDI, NYPD POLICE
OFFICERS JOHN/JANE DOES 1-5,

Defendants.
----- X

**AFFIDAVIT OF ANITA
CAMPBELL IN
SUPPORT OF
DEFENDANT'S
MOTION FOR
SUMMARY JUDGMENT**

15-CV-6511 (JBW) (PK)

ANITA CAMPBELL declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am currently employed as a Parks Inspector at the New York City Department of Parks and Recreation ("the Agency"), in their Operations and Management Planning office ("OMP"). I have been employed by the Agency in this position since 2009. I submit this affidavit in support of the Defendant's Motion for Summary Judgment. This affirmation is based on the books and records of the Agency and my own personal knowledge.

2. As part of my duties as a Parks Inspector, I perform inspections of Agency properties as part of the Parks Inspection Program ("PIP"). This involved visiting properties which are under the jurisdiction of the Agency, inspecting their condition, and grading them according to a variety of criteria. I then prepare a report of my findings. These reports include photographs.

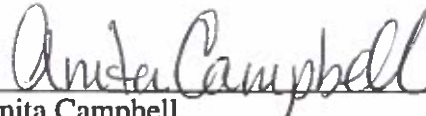
3. As part of my duties, on August 13, 2013 I personally performed an inspection of Hallet's Cove Playground, also known as Parks Property Q226-01. This inspection included taking photographs of the property.

4. A true and accurate copy of this PIP report is attached hereto as Exhibit A.

5. This PIP report is a record of an inspection performed by the Agency, and is maintained by the Agency in the ordinary course of business.

Dated: New York, New York
April 11, 2017

JONATHAN C. LI
NOTARY PUBLIC-STATE OF NEW YORK
No. 02LI6284919
Qualified in Nassau County
My Commission Expires July 01, 2017


Anita Campbell

Sworn to before me this
11 day of April, 2017.


NOTARY PUBLIC/COMMISSIONER OF DEEDS

Exhibit A

Exhibit F



Parks Inspection Program Site Inspection Report

Summer 5, 2013
8/13/2013
10:40 AM to 11:10 AM

Property ID:	Q226-01	District:	01
Site Name:	Hallets Cove Playground (area A)	Boro:	Queens
Prop. Name:	HALLETS COVE PLGD	Category:	Small Park
Site Location:	Vernon Blvd, Main Ave	Sub-Category:	Neighborhood Plgd

85296

Overall Condition: A Cleanliness Rating: A

Comments: CS officially closed.

Recommendation:

Cleanliness Features	<u>Hazards</u>	<u>Conditions</u>
Glass	A	
Graffiti	A	Spray Paint on HBCT (signs of removal present, but still lightly showing)
Litter	A	Litter Light within MPPA
Weeds	A	
Landscape Features	<u>Hazards</u>	<u>Conditions</u>
Trees	A	
Structural Features	<u>Hazards</u>	<u>Conditions</u>
Benches	A	
Fences	A	
Paved Surfaces	A	15% of Asphalt cracked within MPPA
Play Equipment	A	
Safety Surface	A	
Sidewalks	A	

D45

QQ

Park Elements

Element	Recommended	Present	Damaged	Comments	Problems
Routed Sign	4	4	0		0
Consolidated Sign	3	2	0		1
K-Swing	4	4	0		0
"A" Drinking Fountain	1	1	0		0
ADA-Accessible Sign	1	0	0	needed	1



Parks Inspection Program Site Inspection Report

Summer 5, 2013
8/13/2013
10:40 AM to 11:10 AM

Property ID:	Q226-01	District:	01
Site Name:	Hallets Cove Playground (area A)	Boro:	Queens
Prop. Name:	HALLETS COVE PLGD	Category:	Small Park
Site Location:	Vernon Blvd, Main Ave	Sub-Category:	Neighborhood Plgd

85296

Overall Condition: A Cleanliness Rating: A

Comments: CS officially closed.

Recommendation:

Cleanliness Features	<u>Hazards</u>	<u>Conditions</u>
Glass	A	
Graffiti	A	Spray Paint on HBCT (signs of removal present, but still lightly showing)
Litter	A	Litter Light within MPPA
Weeds	A	
Landscape Features	<u>Hazards</u>	<u>Conditions</u>
Trees	A	
Structural Features	<u>Hazards</u>	<u>Conditions</u>
Benches	A	
Fences	A	
Paved Surfaces	A	15% of Asphalt cracked within MPPA
Play Equipment	A	
Safety Surface	A	
Sidewalks	A	

D47

D48

QQ

Park Elements

Element	Recommended	Present	Damaged	Comments	Problems
Routed Sign	4	4	0		0
Consolidated Sign	3	2	0		1
K-Swing	4	4	0		0
"A" Drinking Fountain	1	1	0		0
ADA-Accessible Sign	1	0	0	needed	1

D48

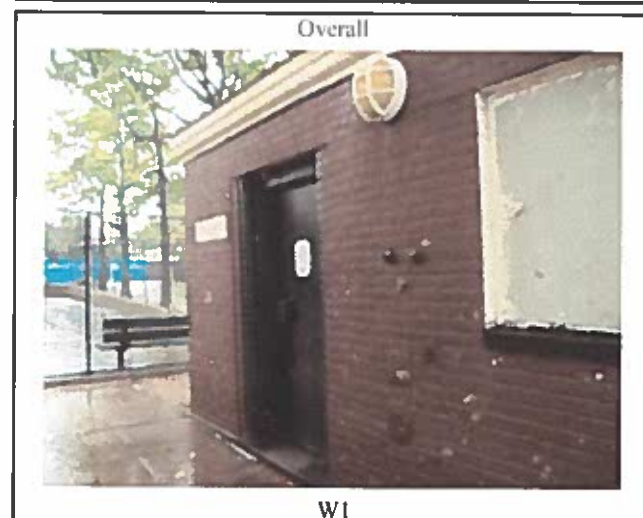
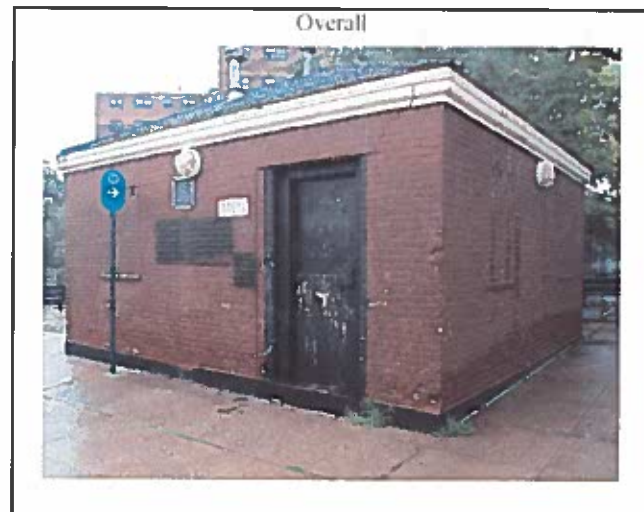


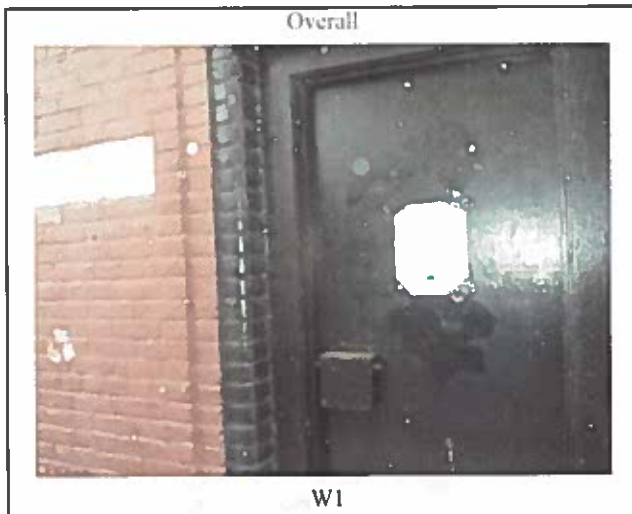
Parks Inspection Program
Park Inspection Photo Report

Summer 5, 2013
8/13/2013

Property ID:	Q226-01	District:	01
Site Name:	Halletts Cove Playground (area A)	Borough:	Q
Property Name:	HALLETS COVE PLGD	Category:	Small Park
Site Location:	Vernon Blvd, Main Ave	Sub-Category:	Neighborhood Plgd

6 Photos were attached to this inspection.







Parks Inspection Program
Park Inspection Photo Report

Summer 5, 2013
8/13/2013

Property ID:	Q226-01	District:	01
Site Name:	Hallets Cove Playground (area A)	Borough:	Q
Property Name:	HALLETS COVE PLGD	Category:	Small Park
Site Location:	Vernon Blvd, Main Ave	Sub-Category:	Neighborhood Plgd

15 Photos were attached to this inspection.

Overall



Overall



Overall



Overall





Spray Paint on HBCT (signs of removal present, but still lightly showing)



Litter Light within MPPA



Litter Light within MPPA

Paved Surfaces Condition: A



Asphalt cracked within MPPA

Paved Surfaces Condition: A



Asphalt cracked within MPPA

Paved Surfaces Condition: A



Asphalt cracked within MPPA

Paved Surfaces Condition: A



Asphalt cracked within MPPA

Paved Surfaces Condition: A



Asphalt cracked within MPPA